

SNP Administrative Review Findings**Elwood Community School Corp (5280)****Program Year 2018****Elwood Community School Corp (5280)**

1306 North Anderson Street
Elwood, IN 46036-1104

Food Service Contact

Mrs. Roxie Fred
Food Service Director
(765) 552-4095

Executive Contact

Mr. Christopher Daughtry
Superintendent
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No. of Sites / Reviewed: 3 / 2
Month of Review: February 2018

Commendations

- * The new FSD is really making an effort to turn this school around. She asks questions, asks for suggestions how to improve, and is willing to take the necessary steps to make this food program compliant in every way. Her staff at the high school are so willing to make any necessary changes. They are all very friendly, happy people.

Certification and Benefit Issuance - Elwood Community School Corp (5280)

123. *On-site observation validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions?*

Finding 9000: Free and Reduced applications incomplete

Several free and reduced applications were processed without being complete with the household size and/or Social Security section completed.

Corrective Action:

Going forward, the SFA needs to change their application review procedures to ensure all sections of the application are filled out accurately. No further action is required.

123. *On-site observation validate Off-Site Assessment Tool responses to Certification and Benefits Issuance questions?*

Finding 9000: Free and Reduced applications with case numbers

Free and reduced applications with case numbers are not being looked up in the STN Application Center.

Corrective Action:

As stated in the 2018 Eligibility Manual for School Meals Determining and Verifying Eligibility on page 34, see the proper procedure below and then confirm that in the future, this procedure will be practiced.

When a household submits an application indicating an Assistance Program:

- The applicable Assistance Program must be identified and the program case number must match the applicable Assistance Program.
- The child must be given free meals.
- The LEA official should compare the applications with case numbers to the direct certification list to determine if any children listed on the application are on that list.

When a match is found:

The application must be disregarded;
The household must be placed on the direct certification list; and
Categorical eligibility must be extended to all children in the household.

When a match is not found, the LEA should:

Contact the household for further clarification; or
Verify the application for cause.

Technical Assistance:

Discussed with SFA the importance of verifying case numbers when supplied by household. As these case numbers are found, those students should be classified as DC and given the designation of DCF, DC Medicaid R, etc.

126. *Certification Benefits/Issuance Review Method, applications correctly approved?*

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Based on the selected students, eligibility determination errors were found, as listed on the SFA-1.

Corrective Action:

In your submitted corrective action plan, provide the date of correction made in your point of sale student roster for each eligibility determination error student name.

128. *Correct conversion factors used for applications with more than one income frequency?*

Finding 9000: Technical Assistance**Technical Assistance:**

Free and reduced applications must always be distributed with the current school year's Parent Letter and Instructions.

Verification - Elwood Community School Corp (5280)

209. *Review of verified applications – properly selected, replaced applications correctly, verified correctly?*

Finding 9000: Applications not verified for cause

No applications that are questionable are verified for caused. (Many applications have zero income.)

Corrective Action:

In the future, SFA should flag questionable applications during registration or whenever applications are received. Those applications should then be verified for cause to ensure only those eligible are receiving benefits. Corrective action should include how this process will be implemented in detail.

211. *Verification notification letter?*

Finding 9044: Verification notification letter does not contain all required information.

The SFA's verification notification letter is incomplete. Areas which should be filled in, such as dates, telephone numbers, and email addresses, are left blank.

Corrective Action:

SFA should utilize the state's verification notification letter template in the future, ensuring that each letter is properly completed with the correct pertinent information. SFA shall submit their new verification notification letter template for their corrective action.

215. *SFA complete verification by Nov 15 or request extension?*

Finding 9048: Verification not completed by November 15.

For 2017-2018 school year, the SFA did not complete its Verification process prior to November 15. The SFA did not have an extension approved by the SA, allowing the SFA to complete its Verification process by December 15.

Corrective Action:

SFA should take proper action to ensure verification is completed by November 15 annually. The process should be started on October 1 or after. SFA must ensure they adhere to proper dates for sending second notification letter and verification results letter. This will ensure the verification process is completed on time. In your submitted corrective action plan, provide the procedure in which you will use to complete verification in the future.

Resource Management Comprehensive Review - Elwood Community School Corp (5280)

756. *New Equipment Purchases*

Finding 9000: Did not seek prior approval for equipment exceeding \$5,000

SFA did not seek prior State approval for equipment purchases valued at \$5,000 or more. I review of equipment purchases shows that while prior approval was not requested, the purchases were considered allowable.

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SFA must ensure all staff involved with procurement in the school nutrition programs must be aware of and comply with this requirement. The SFA must submit documentation showing this is part of their current procurement procedures as proof of corrective action. Further findings in this area could result in the disallowance of the costs associated with these equipment purchases.

*766. Process for calculating compliance with Revenue From Nonprogram Foods requirements?***Finding 9000: Did not complete Revenue From Non-Program Food Tool**

SFA did not complete the Revenue from Non-program Food tool to calculate compliance with the revenue from non-program food requirements.

Corrective Action:

SFA must complete the Revenue from Non-program Food Tool for a 5-day period in order to test compliance with this requirement. The tool must be submitted as part of their corrective action.

Technical Assistance:

Email sent to FSD containing instructions and requirements for completing RNPF tool.

*771. SFA obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency?***Finding 9129: SFA did not obtain an approved indirect cost rate from the State Education Agency (SEA) or other State Agency for the most recently completed fiscal year SY 2016-17.**

The SFA did not obtain an indirect cost rate from the Indiana Department of Education for SY 16-17 being reviewed and indirect costs were charged at an amount of \$1,750.00 per month to the NSLP Account.

Corrective Action:

Amount of indirect costs charged to NSLP program during SY 16-17 was $1,750.00/\text{Mo} = \$21,000$. This amount must be reimbursed to the NSLP account by another non-federal program. **Please provide documentation showing the transfer of money into the food service account has taken place.**

Technical Assistance:

Met with Superintendent and FSD concerning applying for Indirect Cost through School Finance, Learning Connection.

General Program Compliance - Elwood Community School Corp (5280)*810. Non-discrimination on appropriate Program materials?***Finding 9000: Incorrect Civil Rights statement**

Incorrect Civil Rights statement is on the menus and school website.

Corrective Action:

SFA must ensure they are using the correct, most up-to-date version of the Civil Rights statement. No further action required.

Technical Assistance:

It is important to note that the USDA no longer requires the civil rights statement on menus.

*1007. On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?***Finding 9000: Wellness Policy procedures**

The wellness policy procedures are not being practiced within the school corporation.

Corrective Action:

SFA shall consult with other school officials, staff, students, and community members on developing an active wellness policy. Wellness policy should be reviewed yearly to ensure it is compliant and being utilized within the school system. For corrective action, SFA must submit a revised version of their wellness policy.

1400. Food safety plan – contain required elements, copy available at each school?

SNP Administrative Review Findings**Elwood Community School Corp (5280)****Program Year 2018****Finding 9000: Food Safety Plan updated**

The food safety plan has not been updated since 2014-2015 and is not completed. Food safety plan was located in director's office.

Corrective Action:

Food safety plan must be reviewed and updated each year. Also, a copy of the food safety plan must be made available in each kitchen. For corrective action, SFA must submit an up-to-date food safety plan.

1501. Records retained for 3 years?

Finding 9000: Charge Policy

Charge policy-not enforced does it have all the minimum requirements

Corrective Action:

SFA must review the charge policy to include all necessary elements. This policy will need to be discussed with school officials and put into place. SFA must submit their revised charge policy as their corrective action.

1501. Records retained for 3 years?

Finding 9000: Uncollectible debt

During the Administrative Review of School Nutrition Programs, it was determined that the SFA has accrued a large amount of uncollectible debt. While it is up to the local education authority as to how long this debt can remain on the books, eventually a transfer of nonfederal funds must be made to clear the debt. USDA suggests that uncollectible debt be addressed annually. Please ensure that any uncollectible debt is discussed during a State Board of Accounts audit.

Corrective Action:

SFA must discuss uncollectible debt with State Board of Accounts and school leaders to determine how debt will be cleared.

SNP Administrative Review Findings**Elwood Community School Corp (5280)****Program Year 2018****Elwood Elementary School (5157)**

1306 North Anderson Street
Elwood, IN 46036-1104

Food Service Contact

Ms. Carol Bradshaw
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Month of Review: February 2018

Date of Onsite Review: March 13, 2018

Other Federal Programs - Elwood Elementary School (5157)**4. Validate snack counts – snacks properly counted and claimed?****Finding 9221: Snacks are not being properly counted and claimed.**

No count at point-of-service is being taken. Staff is using the attendance roster and leftover snacks to determine daily count.

Corrective Action:

A counting system must be put in place immediately to accurately count students receiving a reimbursable snack. SFA must submit, for their corrective action, the new procedure for properly counting and claiming snacks.

5. On-site observation – Snack counts reasonable, Meal Service operation compliant?**Finding 9223: As observed on the Day of Review, the snack meal service operation was not in compliance with all program requirements.**

Program requirements not met: meal counting and claiming.

Corrective Action:

Correct count must be taken to ensure correct claiming is occurring. SFA received technical assistance during administrative review.

7. Site monitored in first 4 weeks of operation, date, deficiencies/CA?**Finding 9228: The SFA has not monitored this site's Afterschool Snack Program within the first 4 weeks of operation each year.**

Afterschool Snack Program monitoring was not completed within the first 4 weeks of operation.

Corrective Action:

Beginning school year 2018-2019, SFA will complete self-monitoring of Afterschool Snack Program within first 4 weeks of start of school. SFA will submit their corrective action plan for ensuring self-monitoring is completed within the first 4 weeks of the start of school.

1700. ASSP – areas identified requiring TA, CA?**Finding 9000: Appropriate students receiving after school snacks**

Daycare children and preschoolers are served snack during school hours. These snacks are not eligible for reimbursement.

Corrective Action:

SFA was instructed to only count those receiving snack after school hours were to be claimed for reimbursement. With that, the SA will set up a meeting with CACFP and the SFA to discuss options for claiming daycare children and preschoolers' snacks.

General Program Compliance - Elwood Elementary School (5157)**811. Justice for All poster displayed in prominent location?****Finding 9101: Justice For All poster not displayed in prominent location.**

Incorrect USDA "And Justice for All" poster being displayed.

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Discussed with SFA correct "And Justice for All" poster that is required. SA will send correct poster. No further action needed.

SNP Administrative Review Findings**Elwood Community School Corp (5280)****Program Year 2018****Elwood Jr/Sr High School (5149)**

1306 North Anderson Street
Elwood, IN 46036-1104

Food Service Contact

Ms. Roxie Fred
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(765) 552-4095

Month of Review: February 2018

Date of Onsite Review: March 14, 2018

Meal Counting & Claiming - Elwood Jr/Sr High School (5149)*317. DOR meal observation – overt identification, F/R eligible students treated differently?***Finding 9062: Overt identification of students receiving F/R benefits.**

During breakfast day of review, paid students were claimed for a reimbursable breakfast but were not required to follow the OVS breakfast requirements. Cashier's reasoning for this was this was because they were paying students.

Corrective Action:

Once the cashier was notified of about this error, she immediately began correct procedures. NO FURTHER ACTION IS REQUIRED.

Meal Components & Quantities - Elwood Jr/Sr High School (5149)*400. DOR – all required components available during entire meal service, all lines?***Finding 9000: Non-compliant grain quantity served**

Chef salads on the day of the lunch review had only 7 grams of grain ounce equivalency. This does not meet the daily minimum for grades 9-12. This finding was corrected before any lunches were served, therefore, no lunches were disallowed.

Corrective Action:

Confirm when planning menu grades 9-12 will always be offered the daily minimum of at least two grain ounce equivalency. SFA shall submit, for their corrective action, their revised menu which includes the correct grain requirements.

*401. DOR - meals selected by students contain all required components/quantities?***Finding 9000: Non-compliant juice offering**

Students are allowed to choose two juices daily for breakfast. Only 50% of the full fruit requirement can be in the form of juice.

Corrective Action:

Confirm that beginning immediately students are no longer allowed to take two juices to meet the one cup fruit/vegetable breakfast requirement. Correction was made on-site. No further action required.

*409. Review period production records/documentation - required meal components offered, daily/weekly requirements met?***Finding 9000: Other Finding *Repeat Finding**

Grades 7-8 were not served at least 1/2 cup legume.

Corrective Action:

SFA should review their menu weekly to ensure all menued items allow students to receive full components daily and weekly. Submit revised menu as corrective action.

*409. Review period production records/documentation - required meal components offered, daily/weekly requirements met?***Finding 9000: Other Finding *Repeat Finding**

Insufficient grain ounces for each day of the week with grades 9-12 and for the week for grades 7-8.

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The SFA was instructed which entrees needed added grains to ensure daily and weekly quantity requirements are met. SFA should review their menu weekly to ensure all menued items allow students to receive full components daily and weekly.

409. *Review period production records/documentation - required meal components offered, daily/weekly requirements met?*

Finding 9000: Technical Assistance**Technical Assistance:**

Standardized recipes must be kept in the kitchen prep area for reference.

410. *Review period menus and production records - Quantities and meal pattern requirements met?*

Finding 9000: Production records incomplete

During the month of review, both breakfast and lunch production records do not have the number of student, adult, or a la carte served column completed.

Corrective Action:

SFA must complete each column of the production record to ensure records are properly maintained. Submit revised production record as corrective action.

502. *DOR - Signage explaining OVS reimbursable meal near/at beginning of service line?*

Finding 9000: Communicating availability when using Offer vs. Serve

An OVS poster is displayed, but the students do not know they may take a juice and fruit or two fruits for breakfast.

Corrective Action:

Discussed with SFA the importance of signage. New signage will be placed on serving line and clearly state what is able to be taken as a reimbursable meal. SFA will submit a copy of new OVS signage as corrective action.

Dietary Specifications - Elwood Jr/Sr High School (5149)

603. *On-site portion of Dietary Specifications Tool completed, TA, CA required?*

Finding 9000: Technical Assistance**Technical Assistance:**

Advised not to serve chicken tenders, mac and cheese and breadsticks in the same meal.

Discussed that green peas are a starchy vegetable not legume.

A lot of starchy vegetables are served for the week in the MOR-corn2X, green peas, cheese potatoes and mashed potatoes.

The same vegetable subgroups need to be offered on all the serving lines.

General Program Compliance - Elwood Jr/Sr High School (5149)

901. *On-site monitoring review completed prior to February 1?*

Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.

The SFA did not conduct an on-site review of the school's meal counting and claiming procedure prior to February 1 of the current Program Year. The on-site review occurred after February 1 without SA approval of an extension.

Corrective Action:

FSD stated that she was not aware of this requirement and moving forward she will put this requirement on her calendar annually to ensure it will be conducted as required.

NO FURTHER ACTION REQUIRED



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Program Year 2018

Elwood Community School Corp (5280)